

L. Vartain Horn Decl.

Exhibit 4

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and RASIER-CA, LLC

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
19 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF RANDY
LUSKEY**

20 This Document Relates to:
21 All Cases

1 **DECLARATION OF RANDY LUSKEY**

2 I, Randy Luskey, declare the following:

3 1. I am over the age of 18 and am a resident of Orinda, California.

4 2. I am a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul,
5 Weiss”). I am a member in good standing of the Bar of the State of California. I know the following
6 facts to be true of my own knowledge, except those matters stated to be based on information and
7 belief, and if called to testify, I could competently do so.

8 3. I have reviewed the article relating to this litigation that appeared in the *New York Times*
9 on August 6, 2025 (hereinafter “Article”).

10 4. After review of the Article, I contacted each Paul, Weiss attorney and staff member
11 who, based on a reasonable investigation, may have had access to the compilation of sealed
12 documents/exhibits (or a significant subset thereof) submitted in connection with Plaintiffs’ summary
13 judgment opposition in the JCCP. Each of those attorneys and staff members confirmed that they had
14 not shared or in any way provided access to any of the documents referenced in the Article to the *New
15 York Times* or its agents, either directly or indirectly.

16 5. In addition, I hereby confirm that I have not shared or in any way provided access to
17 any of the documents referenced in the Article to the *New York Times* or its agents, either directly or
18 indirectly.

19 I declare under penalty of perjury under the laws of the State of California and the laws of the
20 United States of America that the foregoing is true and correct.

21 Executed on August 12, 2025, in San Francisco, CA.

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Randy Luskey